

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

EARL ALLEN LEWIS,)	Judge Sharp
Plaintiff,)	Magistrate Judge Knowles
)	Case No. 3:13-cv-0007
v.)	Jury Demand
)	
RICKY CHANDLER, in his Official)	
Capacity as Police Chief for the City)	
Of Dickson Police Department;)	
)	
and SCOTT HULL, Individually and)	
in his Official Capacity as an Officer)	
for the City of Dickson Police)	
Department;)	
Defendants.)	

AND

EARL ALLEN LEWIS,)	Judge Haynes
Plaintiff,)	Magistrate Judge Knowles
)	Case No. 3:13-cv-0111
v.)	Jury Demand
)	
KENNETH BROWN, Individually)	
and in his Official Capacity as a)	
Deputy with the Dickson County)	
Sheriff's Department;)	
)	
CLAYTON (NICK) JACKSON;)	
)	
AMANDA GIVENS MOBLEY;)	
)	
JOHN DOES I – V, Individually and)	
in their Official Capacities as)	
Deputies for the Dickson County)	
Sheriff's Department;)	
Defendants.)	

JOINT MOTION TO SUSPEND CASE MANAGEMENT ORDER
AND FOR JUDICIAL SETTLEMENT CONFERENCE

Come now the parties to these consolidated actions¹, by and through counsel, who hereby jointly move this Court for entry of an Order suspending deposition and all other pending deadlines under the current case management order so that the parties may engage in a judicial settlement conference.

In support of this motion, counsel for the parties state that, due to their trial schedules, loss of contact with witnesses, and various other factors related to the ongoing litigation in these cases, they have been unable to meet the deadline to complete fact witness depositions by July 31, 2014. Further, after discussion among counsel and a period of consideration of the ongoing litigation costs and the conclusion that it is possible that more than ten additional depositions would be needed, the parties agree that these cases should proceed to a judicial settlement conference at this time.

Currently, the case of Lewis v. Brown, et al. is set for a three-day jury trial to begin on February 3, 2015, and Lewis v. Chandler is set for a three-day jury trial to begin on March 24, 2015. Undersigned counsel believe that the additional time necessary to complete depositions and expert discovery, as well as the time needed to prepare and complete a judicial settlement conference, would require a continuance of the upcoming dispositive motion deadlines in these cases and, as a result, the trial dates in these cases also would need to be continued.

Accordingly, the parties respectfully request that these cases be referred for a joint judicial settlement conference and that that the deposition deadline and all other pending deadlines in these cases (including Defendants Hull and Chandler's expert witness disclosure

¹ These actions have been consolidated for discovery only.

deadline) be suspended until after a judicial settlement conference can be completed. Should these cases not resolve through a judicial settlement conference, the parties respectfully submit that a joint case management conference should be set to address the re-scheduling of the remaining deadlines and trial dates in these actions.

Respectfully submitted,

/s/Richard M. Brooks

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CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2014, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. Parties may access this filing through the Court's electronic filing system. All other parties will be served by regular U.S. Mail, postage prepaid.

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